

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRACY REIN,

Plaintiff,

-against-

CAB EAST LLC., FORD MOTOR CREDIT COMPANY,
LLC., and BRIAN K. DAHMS,

Defendants.
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ECF CASE: 08-CV-02899

**SUPPLEMENTAL RESPONSE
TO INTERROGATORIES**

Plaintiff, by her attorneys, Edward W. Armstrong, P.C., as and for her
Supplemental Response to Interrogatories, pursuant to the demand of the defendants,
alleges, upon information and belief, as follows:

3. State the nature and extent of all injuries.

**The plaintiff sustained the following injuries as a result of the subject
occurrence:**

- Intrasubstance tear of posterior horn of medial meniscus, left knee;
- Partial tear of anterior cruciate ligament, left knee;
- Popliteal cyst, left knee;
- Joint effusion, left knee;
- Left knee derangement;
- Necessity of surgery, left knee;
- Posterior disc herniation at L3-4 and L4-5 with narrowing of bilateral L4-5 and right L3-4 neural foramina and impingement on thecal sac;
- Posterior disc bulge at C3-4 impinging on thecal sac;
- Bilateral C5 radiculopathy;
- Bilateral L5 radiculopathy;
- Derangement of cervical spine;
- Derangement of lumbar spine;
- Left elbow derangement;
- Right hip derangement;
- Necessity of epidural injections;
- Necessity of electroacupuncture;
- Necessity of electrodiagnostic studies;

- Necessity of MRI;
- Necessity of physical therapy;
- Necessity of use of crutches;
- Necessity of use of cane;
- Necessity of use of pain medication;
- Severe and persistent pain about all affected areas;
- Stiffness and soreness of all affected areas;
- Limitation of range of motion of all affected areas;
- Injury to and involvement of surrounding nerves, blood vessels and tendons, ligaments, cartilage and soft tissue in and around the above set-forth areas;
- Limitation of activities;
- Severe and physical emotional pain, stress and trauma.
- Surgery of the Left Knee, Surgeon Richard M. Seldes, M.D., conducted on March 4, 2008 at North Shore – Long Island Jewish Health System, Forest Hills Hospital 102-01 66th Road, Forest Hills, New York 11375;
- Surgery consisted of: 1. Arthroscopy, Left Knee, partial medial meniscectomy, 2. Synovectomy and debridement, multiple compartments of knee, 3. Chondroplasty, patellofemoral joint, 4. Injection of left knee;
- Adverse reaction to Fentanyl, drug that was prescribed for chronic back pain as a result of the subject accident: Abdominal pain, epigastric, relieved with vomiting, mild, nonradiating, diarrhea, non-bloody no mucous.
- Lumbar Discography, June 18, 2008; performed by Surgeon Eugene Liu, M.D.; Lumbar Discogenic pain, diffuse disc derangement and bulging, lumbar radiculitis. This is an abnormal discography study. There are abnormal morphology noted at the L3-4, L4-5 and L5-S1 with concordant pain and symptoms reported at those three levels at the relatively low pressure within the disc space. This is a concordant discography study involving the L3-4, L4-5 and L5-S1. L2-3 being a normal reference level with no pain reporting.

4. Specify those injuries claimed to be permanent.

Upon information and belief, all of the above mentioned injuries and their effects, except for minor contusions and abrasions, are permanent.

7. State the name of each and every hospital, clinic or doctor's office where any treatment or examination was rendered, and length of time, if any, confined there and the number and dates of visits.

The plaintiff received treatment or examination from the following health care providers:

- **Bellevue Hospital Center, 462 First Avenue, New York, NY, on December 19, 2007;**
- **Douglas A. Schwartz, D.O., P.C., d/b/a East Side Medical Group, 150 East 58th Street, Suite 1801, New York, NY 10022, from December 20, 2007 to present;**
- **Dr. Eugene Liu, Park East Sports Medicine and Rehabilitation, 62 East 88th Street, New York, NY 10128, from approximately March, 2008 to present;**
- **Dr. Richard Seldes, 95 University Place, New York, NY 10003, from February, 2008 to present;**
- **North Shore University Hospital at Forest Hills, 102-01 66th Road, Forest Hills, NY 11375, on March 4, 2008;**
- **Lenox Hill Radiology & Medical Imaging Associates P.C., 61 East 77th Street, New York, NY 10021, on December 20, 2007, January 8, 2008, and January 12, 2008;**
- **Dr. Stanley Resor, M.D., Neurological Institute, 710 West 168th Street, New York, NY 10032**
- **Plaintiff treated at St. Lukes Roosevelt Hospital, 1000 10th Avenue, New York, New York 10019 on May 13, 2008.**
- **Dr. Frank P. Cammisa, JR., 523 East 72nd Street, New York, NY 10021**

Annexed hereto are:

- **Operative Report dated March 4, 2008.**
- **Operative Report dated June 18, 2008.**

Dated: New York, NY
July 10, 2008

Yours, etc.,



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